

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE TRICOR INDIRECT PURCHASER
ANTITRUST LITIGATION

)
)
) C.A. No. 05-360 (KAJ)
) (consolidated)
)

)
) THIS DOCUMENT RELATES TO:
) PAINTERS' DISTRICT COUNCIL NO.30
) HEALTH AND WELFARE FUND and
) RICHARD G. WILDE, C.A. No. 05-360 (KAJ)
)

)
) VISTA HEALTH PLAN, INC. and ROSS LOVE,
) C.A. No. 05-365 (KAJ)
)

)
) PENNSYLVANIA EMPLOYEES BENEFIT
) TRUST FUND, C.A. No. 05-390 (KAJ)
)

)
) ALLIED SERVICES DIVISION WELFARE
) FUND and HECTOR VALDES,
) C.A. No. 05-394 (KAJ)
)

)
) DIANA KIM, C.A. No. 05-426 (KAJ)
)

)
) ELAINE M. PULLMAN, NEIL PERLMUTTER,
) HELENA PURLMUTTER and LULA RAMSEY,
) C.A. No. 05-450 (KAJ)
)

)
) PHILADELPHIA FEDERATION OF TEACHERS
) HEALTH AND WELFARE FUND,
) C.A. No. 05-467 (KAJ)
)

)
) CINDY CRONIN, C.A. No. 05 482 (KAJ)
)

)
) CHARLES SHAIN and SANDRA KRONE,
) C.A. No. 05-475 (KAJ)
)

)
) LOCAL 28 SHEET METAL WORKERS,
) C.A. No. 05-516 (KAJ)
)

)
) ALBERTO LITTER, C.A. No. 05-695 (KAJ)
)

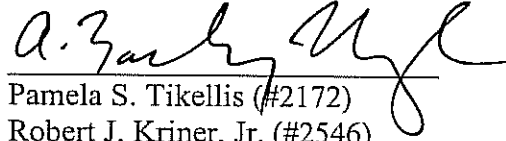
**UNOPPOSED MOTION TO FILE END PAYOR PLAINTIFFS'
CONSOLIDATED CLASS ACTION COMPLAINT UNDER SEAL**

End Payor Plaintiffs hereby move for an Order permitting them to file the attached End Payor Plaintiffs' Consolidated Class Action Complaint in the above captioned action under seal. This motion is necessary because the End Payor Plaintiffs' Consolidated Class Action Complaint contains information obtained from documents designated by defendants as highly confidential and produced to plaintiffs pursuant to Local Rule 26.2. Plaintiffs do not believe that the non-current, summary information contained in the End Payor Plaintiffs' Consolidated Class Action Complaint warrants confidential treatment and intend to move the Court to unseal the End Payor Plaintiffs' Consolidated Class Action Complaint once it has been filed.

WHEREFORE, plaintiffs respectfully request entry of the attached Order permitting them to file their End Payor Plaintiffs' Consolidated Class Action Complaint under seal.

Dated: September 23, 2005

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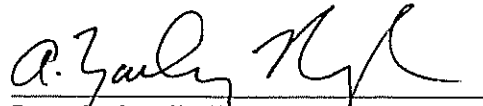
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RULE 7.1.1 CERTIFICATE

I hereby certify that the subject of Plaintiffs' Unopposed Motion to File End Payor Plaintiffs' Consolidated Class Action Complaint Under Seal and Proposed Order has been raised by plaintiffs' counsel, A. Zachary Naylor, with Anne S. Gaza, Esquire, counsel for the defendants Laboratories Fournier, S.A. and Fournier Industrie et Sante, and have been advised that those defendants do not oppose the Motion. Mary B. Graham, Esquire, counsel for defendant Abbott Laboratories, has advised that without having seen the pleading in question her client does not oppose the Motion.

Dated: September 23, 2005

CHIMICLES & TIKELLIS LLP

A handwritten signature in black ink, appearing to read 'P. S. Tikellis', is written over a horizontal line.

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